

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

\_\_\_\_\_  
ZHAOYIN WANG  
Plaintiff,

v.

BETA PHARMA, INC., DON ZHANG,  
AND ZHEJIANG BETA PHARMA  
CO., LTD.,  
Defendants.  
\_\_\_\_\_

Civil Action No. 3:14-cv-01790-VLB

DECEMBER 4, 2014

NOTICE OF FILING AMENDED RETURN

Plaintiff, by counsel, hereby files the officer's amended return of service of process, copy attached as Exhibit A.

PLAINTIFF ZHAOYIN WANG,

By: \_\_\_\_\_ /s/  
Jonathan Katz, Esq.  
Jacobs & Dow, LLC  
350 Orange Street  
New Haven, Connecticut 06511  
Telephone: (203) 772-3100  
Facsimile: (203) 772-1691  
Federal Juris No.: ct00182  
Email [jkatz@jacobsllaw.com](mailto:jkatz@jacobsllaw.com)

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 4, 2014, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/

Jonathan Katz, Esq.  
Jacobs & Dow, LLC  
350 Orange Street  
New Haven, Connecticut 06511  
Telephone: (203) 772-3100  
Facsimile: (203) 772-1691  
Federal Juris No.: ct00182  
Email [jkatz@jacobsllaw.com](mailto:jkatz@jacobsllaw.com)

**EXHIBIT A**

**SUMMONS - CIVIL**

JD-CV-1 Rev. 9-12  
C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a,  
52-48, 52-59, P.B. Secs. 3-1 through 3-21, 8-1

STATE OF CONNECTICUT  
**SUPERIOR COURT**  
www.jud.ct.gov

See page 2 for instructions

- ☐ "X" if amount, legal interest or property in demand, not including interest and costs is less than \$2,500.  
☒ "X" if amount, legal interest or property in demand, not including interest and costs is \$2,500 or more.  
☐ "X" if claiming other relief in addition to or in lieu of money or damages.

TO: Any proper officer; BY AUTHORITY OF THE  
STATE OF CONNECTICUT, you are hereby  
commanded to make due and legal service of  
this Summons and attached Complaint.

Address of court clerk where writ and other papers shall be filed (Number, street, town and zip code) (C.G.S. §§ 51-346, 51-350)		Telephone number of clerk (with area code)	Return Date (Must be a Tuesday)
235 CHURCH STREET, NEW HAVEN, CT 06510		(203) 503-6800	NOVEMBER 25, 2014
<input checked="" type="checkbox"/> Judicial District <input type="checkbox"/> Housing Session	GA Number: NEW HAVEN	Case type code (See list on page 2) Major: C Minor: 90	

**For the Plaintiff(s) please enter the appearance of:**

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code)	Juris number (to be entered by attorney only)
JACOBS & DOW, LLC, 350 Orange Street, New Haven, CT 06511	432271
Telephone number (with area code)	Signature of Plaintiff (if self-represented)
(203) 772-3100	

Number of Plaintiffs: 1 Number of Defendants: 3 ☐ Form JD-CV-2 attached for additional parties

Parties	Name (Last, First, Middle Initial) and Address of Each party (Number, Street, P.O. Box, Town, State, Zip, Country, if not USA)	
First Plaintiff	Name: WANG, ZHAOYIN Address: 72 Denault Street, Kirkland, Quebec, H9J3X3, CANADA	P-01
Additional Plaintiff	Name: Address:	P-02
First Defendant	Name: BETA PHARMA, INC. Address: 5 Vaughn Drive, Ste. 106, Princeton, NJ 08540 c/o Secretary of State, 30 Trinity Street, Hartford, CT 06106	D-01
Additional Defendant	Name: DON ZHANG Address: 5 Vaughn Drive, Ste. 106, Princeton, NJ 08540 c/o Secretary of State, 30 Trinity Street, Hartford, CT 06106	D-02
Additional Defendant	Name: ZHEJIANG BETA PHARMA CO., LTD. Address: 589 Hongfeng Road, Yuhang, Zhejiang, 311100, CHINA, c/o YINXIANG WANG, Chief Executive Officer, 191 Brook Lane, Cheshire, CT 06410	D-03
Additional Defendant	Name: Address:	D-04

**Notice to Each Defendant**

1. YOU ARE BEING SUED. This paper is a Summons in a lawsuit. The complaint attached to these papers states the claims that each plaintiff is making against you in this lawsuit.
2. To be notified of further proceedings, you or your attorney must file a form called an "Appearance" with the clerk of the above-named Court at the above Court address on or before the second day after the above Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to come to court.
3. If you or your attorney do not file a written "Appearance" form on time, a judgment may be entered against you by default. The "Appearance" form may be obtained at the Court address above or at [www.jud.ct.gov](http://www.jud.ct.gov) under "Court Forms."
4. If you believe that you have insurance that may cover the claim that is being made against you in this lawsuit, you should immediately contact your insurance representative. Other action you may have to take is described in the Connecticut Practice Book which may be found in a superior court law library or on-line at [www.jud.ct.gov](http://www.jud.ct.gov) under "Court Rules."
5. If you have questions about the Summons and Complaint, you should talk to an attorney quickly. The Clerk of Court is not allowed to give advice on legal questions.

Signed (Sign and X proper box)	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Name of Person Signing at Left JONATHAN KATZ	Date signed 10/27/2014
If this Summons is signed by a Clerk: a. The signing has been done so that the Plaintiff(s) will not be denied access to the courts. b. It is the responsibility of the Plaintiff(s) to see that service is made in the manner provided by law. c. The Clerk is not permitted to give any legal advice in connection with any lawsuit. d. The Clerk signing this Summons at the request of the Plaintiff(s) is not responsible in any way for any errors or omissions in the Summons, any allegations contained in the Complaint, or the service of the Summons or Complaint.			For Court Use Only File Date
I certify I have read and understand the above:	Signed (Self-Represented Plaintiff)	Date	
Name and address of person recognized to prosecute in the amount of \$250 Leona Delcore, 114 Soundview Terrace, New Haven, CT 06512			
Signed (Official taking acknowledgment, X proper box)	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Date 10/27/2014	Docket Number

2014 0510 0000 4401 1851

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only. No Insurance Coverage Provided)	
SECURITY FROM THEFT AND LOSS (Not for use with Registered Mail)	
SPECIAL DELIVERY	
Postage	\$
Certified Fee	8.44
Return Receipt Fee (Endorsement Required)	
Registered Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark: PRINCETON NJ 08540

Delivered to: Don: Zhang  
5 Vaughn Drive, Ste 106  
Princeton, NJ 08540

# **FedEx** International Air Waybill For FedEx services worldwide.

1 From: **Sender's FedEx Account Number** 143365875  
**Date** 10/28/14  
**Sender's Name** Robert S. Miller  
**Phone** 2037824805  
**Company** State Marshal  
**Address** 32 Elm Street #11  
**City** New Haven  
**State** CT  
**Country** USA  
**ZIP** 06510

2 To: **Recipient's Name** Linxiang Wang  
**Phone** 057189246822  
**Company** Zhejiang Beta Pharma Co. LTD  
**Address** C/O The Secretary (Chief Fin. Officer)  
**City** 589 Hongfeng Road  
**State** Yuhang  
**Country** China  
**ZIP** 311120  
**Recipient's Tax ID Number for Customs Purposes**  
(i.e., GSTIN/VATIN/ENGIN, or as locally required)

3 Shipment Information ☐ For EU duty: Tick here if goods are not in free circulation and provide CI.

Total Packages: **1** Total Weight: **1** **kg** **1** **in** **cm**

Commodity Description	Harmonized Code	Country of Manufacture	Value for Customs
Legal Document		USA	1.00

More **EU/EEA** items listed in **CI**? ☐ No **EU/EEA** items listed in **CI** (see page 6, B Number)  
☐ No **EU/EEA** required, unless exemption number: **143365875**  
☐ Yes - Enter **AEZ** period of filing date: **143365875**

Total Declared Value for Customs: **1.00**  
 Total Value for Customs (Specify Currency): **1.00**

## 4 Express Package Service

☒ FedEx Intl. Priority ☐ FedEx Intl. First  
Available to select locations.  
☐ ☐ FedEx Intl. Economy  
Available to select locations for FedEx Int. Priority only.

Packages up to 150 lbs./68 kg  
 for packages over 250 lbs. (113 kg), use the  
 FedEx Expedited Service Intl. Air Waybill

Net all services and  
 options are available  
 to all destinations.  
 Dangerous goods cannot  
 be shipped using this  
 Air Waybill.

## 5 Packaging

☐ FedEx Envelope ☐ FedEx Pak ☐ FedEx Box ☐ FedEx Tube  
☐ Other ☐ FedEx 10kg Box\* ☐ FedEx 25kg Box\*

\*These options have been known with special pricing are  
 provided by FedEx for FedEx Int. Priority only.

## 6 Special Handling

☐ HOLD at FedEx Location ☐ SATURDAY Delivery  
Available to select locations for FedEx Int. Priority only.

## 7a Payment Bill transportation charges for

☒ Sender Pays (in  
 Section 1 will be billed) ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash  
 Check/ Cheque  
 FedEx Use Only  
**Account No.** 143365875

Credit Card Exp.

Credit Card Exp. Date

## 7b Payment Bill duties and taxes for

All payments may be subject to German charges as  
 which FedEx does not assume prior to clearance.

☐ Sender Pays (in  
 Section 1 will be billed) ☐ Recipient ☐ Third Party  
**Pay to order of:**

## 8 Your Internal Billing Reference

For 24 characters will appear on invoice.

## 9 Required Signature

Use of this Air Waybill constitutes your agreement to the Conditions of Contract on the back of this Air  
 Waybill, and you warrant that the shipment does not require a U.S. State Department License or permit  
 for export goods. Certain inspection and control, including the War Relocation Authority, may require this  
 agreement and limit our liability for damage or loss to the extent described in the Conditions of Contract.  
 Notwithstanding to the above, any signature or stamp is not required from a United States resident or  
 non-resident who is not a carrier, agent, or employee of a carrier in the U.S. for purposes of  
 this agreement. Signature: *[Signature]*  
 This is not applicable to delivery to the recipient without a release signature.

For Completion Instructions, see back of fifth page.

FedEx  
 Tracking  
 Number

8618 8058 3871

Form  
 ID No.

521

PAINT (USA) - Yellow, Green, Red, Blue  
 C140-2000 FedEx  
 PRINTED IN U.S.A.

0402

The terms and conditions of service may vary from country to country. Consult your local office for specific information.  
 Non-eligible International Air Waybill - 01004-2000 FedEx

Questions? Go to our Web site at [fedex.com](http://fedex.com).

Or in the U.S., call 1.800.247.4747. Outside the U.S., call your local FedEx office.

RETAIN THIS COPY FOR YOUR RECORDS.

SF



November 4, 2014

Dear Customer:

The following is the proof-of-delivery for tracking number **861880583871**.

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**Delivery Information:**

Status:	Delivered	Delivered to:	Receptionist/Front Desk
Signed for by:	M.X	Delivery location:	YUHANG, CN
Service type:	FedEx International Priority	Delivery date:	Oct 31, 2014 13:39
Special Handling:	Deliver Weekday		
	Airbill Automation		

Signature images are not available for display for shipments to this country.

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**Shipping Information:**

Tracking number:	861880583871	Ship date:	Oct 28, 2014
		Weight:	0.6 lbs/0.3 kg

Recipient:  
YUHANG, CN CN

Shipper:  
ROBERTS II LLER  
STATE MARSHAL  
32 ELM STREET 1L  
NEW HAVEN, CT 06510 US

Additional recipient and address information is not available for display for shipments to this country.

Thank you for choosing FedEx.

**OFFICER'S AMENDED RETURN**

STATE OF CONNECTICUT

ss: Cheshire, October 28, 2014

COUNTY OF NEW HAVEN

Then and there by virtue hereof, I served the within named defendant, **ZHEJIANG BETA PHARMA CO. LTD.**, by leaving at the usual place of abode of Yinxiong Wang, Chief Executive Officer, who is duly authorized to accept service and who accepted service, at 191 Brook Lane, Cheshire, CT; a true and attested copy of the original Writ, Summons, and Complaint with my endorsement thereon.

And afterwards, on October 28, 2014, in the Town of Hartford, County of Hartford and State of Connecticut, I served the within named non-resident defendants, **BETA PHARMA, INC. AND DON ZHANG**, by leaving with the Secretary of State, of the State of Connecticut, Agent for Service for said non-resident defendants, **BETA PHARMA, INC. AND DON ZHANG** a true and attested copy of the original Writ, Summons and Complaint with my endorsement thereon and paid the legal fee \$100.00, pursuant to Section 52-59(b) C.G.S.

And afterwards, on October 28, 2014, in the Town of New Haven, I served the within named non-resident defendant, **DON ZHANG OWNER for BETA PHARMA, INC.,** by depositing at the Post Office, a letter, certified mail, return receipt requested addressed:

**Don Zhang  
5 Vaughn Drive, Ste 106  
Princeton, NJ 08540**

receiving therefore the Post Office receipt, hereto annexed. Said letter contained a true and attested copy of the original Writ, Summons and Complaint with my endorsement thereon as to service upon the Secretary of State, of the State of Connecticut, Agent for Service, pursuant to Section 52-59(b) of the C.G.S.



And afterwards, on October 28, 2014, in the Town of New Haven, I served the within named defendant, ZHEJIANG BETA PHARMA CO. LTD c/o YINXIANG WANG, CHIEF EXECUTIVE OFFICER/SECRETARY, by depositing at the Fedex New Haven location, a letter, **FEDEX TRACKING NO. 8618 8058 3871**, return receipt requested addressed:

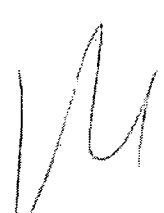
**Zhejiang Beta Pharma Co. Ltd.  
c/o Yinxiang Wang  
Chief Executive Officer/Secretary  
589 Hongfeng Road  
Yuhang, Zheijian 311100 CHINA**

receiving therefore the Post Office receipt hereto annexed. Said letter contained a true and attested copy of Writ, Summons and Complaint with my endorsement thereon.

The within and foregoing is the original Writ, Summons and Complaint with my endorsement thereon.

ATTEST:

FEES:	
Service Fee	\$120.00
Copies	130.00
Endorsements	2.00
Travel	49.80
Postage	8.45
FedEx fee	65.00
Sec. State.	50.00
Total	\$425.25

  
ROBERT S. MILLER  
STATE MARSHAL  
NEW HAVEN COUNTY